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*Attorneys for Defendants,
 Walmart Inc. and Jetson Electric Bikes, LLC*

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH)
 Individually and as Parent and Legal Guardian)
 of W.W., K.W., G.W., and L.W., minor children)
 and MATTHEW WADSWORTH,)

Plaintiffs,)

v.)

WALMART INC. and)
 JETSON ELECTRIC BIKES, LLC,)

Defendants.)

Case No. 2:23-cv-00118-NDF

**DECLARATION OF
 JARED B. GIROUX
 IN SUPPORT OF MOTION TO
 EXCLUDE TESTIMONY OF
 DEREK KING**

I, Jared G. Giroux, state as follows:

1. I am an attorney at McCoy Leavitt Laskey LLC located in Falmouth, Maine.
2. I am one of the attorneys of record for Defendants, Jetson Electric Bikes, LLC and Walmart Inc., admitted *pro hac vice* on September 6, 2023.
3. This case involves a February 1, 2022 residential fire in Green River, Wyoming.
4. The primary liability dispute between the parties is whether the fire originated at a Jetson Plasma hoverboard by the bedroom door of G.W. and L.W.'s bedroom or a smoking shed located outside the bedroom window of G.W. and L.W.
5. My partner, Eugene LaFlamme, attended the deposition of Derek King, taken on August 19, 2024.
6. Attached as Exhibit 1 are the pertinent portions of Derek King's deposition taken on August 19, 2024.
7. Attached as Exhibit 2 is the article written by Nagourney, T., Jordan J. Marsh, L. et al, *The Implications of Post-Fire Physical Features of Cylindrical 18650 Lithium-Ion Battery Cells*, Fire Technol 57, 1707-1722 (2021).
8. Attached as Exhibit 3 is a true and correct copy of the sign-in sheet from the October 30, 2023 Laboratory Examination at Palmer Engineering and Forensics
9. Attached as Exhibit 4 is the case of *Ibarra v. Further Motion, Inc.*, No. 22-cv-14067, 2023 LEXIS 79285, at *24-25 (S.D. Fla. May 1, 2023).
10. Attached as Exhibit 5 is the case of *Bettencourt v. Sharkninja Operating LLC.*, No. 22-cv-09091, 2024 LEXIS 111877 at *19-21 (N.D. Cal. June 25, 2024).

I declare under penalty of perjury that the foregoing is true and correct.



Executed: December 2, 2024

Jared B. Giroux